

**INITIAL ENVIRONMENTAL EXAMINATION (IEE)****PROJECT/ACTIVITY DATA:****Activity Name:** Papua New Guinea (PNG) Biodiversity Program**Country/region:** Papua New Guinea/Pacific Islands**Start Date:** 4/1/2019**End Date:** 3/31/2024**Life of Project Amount (\$):** \$19 million**IEE Prepared by:** Paul Seong and Marian Cruz Navata**Date:** 10/4/2018**Amendment:** no**ENVIRONMENTAL ACTION RECOMMENDED:** (Place X where applicable)

Categorical Exclusion: ☒ Negative Determination with Conditions: ☒  
Positive Determination: ☐ Deferral: ☐

**CLIMATE RISK SCREENING**

Low Risk ☐ Moderate Risk ☒ High Risk ☐

**Purpose and Scope**

The purpose of this document, in accordance with Title 22, Code of Federal Regulations, Part 216 (22CFR216), is to provide a preliminary review of the reasonably foreseeable effects on the environment, as well as recommended Threshold Decisions, for the activities detailed below. This document provides a brief statement of the factual basis for Threshold Decisions as to whether an Environmental Assessment or an Environmental Impact Statement is required for the activities managed under the scope of this document.

The activities under review are recommended for the threshold decisions indicated above in the “Environmental Action Recommended” section.

**Description of Program**

The Papua New Guinea (PNG) Biodiversity is a five-year Program, with a total estimated cost of US\$ 19 million, that seeks to reduce the primary drivers and threats to biodiversity in the country by strengthening management of customary lands and waters that include exceptional areas of terrestrial and marine biodiversity. To support this goal, the Program will work at the national and local levels to strengthen the policies and build the capacity needed to implement systems that support improved customary management of lands and waters. It will also implement activities that reduce significant threats to biodiversity in priority places.

Under the Program, the PNG Biodiversity may involve the following activities which are recommended for two threshold decisions:

- Categorical Exclusion:
  - (a) Education, technical assistance and training (216.2(c)(2)(i));
  - (b) Controlled experimentation exclusively for the purpose of research and field evaluation which are confined to small areas and carefully monitored (216.2(c)(2)(ii));
  - (c) Analyses, studies, and workshops (216.2(c)(2)(iii)) and also evaluation exercises;
  - (d) Document and information transfer (216.2(c)(2)(v)); and
  - (e) Activities that will develop the capability of recipient countries to engage in development planning (216.2(c)(2)(xiv)).
- Negative Determination with Conditions:
  - (a) Support to small / medium enterprises
  - (b) Agriculture
  - (c) Capture fisheries
  - (d) Ecotourism
  - (e) Conditions for forestry: reforestation, natural forest management, and agroforestry
  - (f) Conditions for species management, research, recovery, and reintroduction

### **Background and Country Information**

The PNG has an estimated population of 8.5 million people with 85 percent of the population living in rural areas that are remote with limited access to government services. The country hosts exceptional biological and cultural diversity and has established traditions for managing its rich natural resources through devolved customary rights. It ranks in the top 20 most biologically diverse countries in the world, and is home to an estimated 5 to 7 percent of the world's total number of animal and plant species. Much of this biological diversity is unique globally because the country's climate and varied topography have led to a high rate of endemism.

The decentralized government structure presents uneven governance capacity at various levels despite increased effort at financial devolution to provincial and district level governments in the last 5 years. Although devolution has been planned, government funds have been significantly reduced due to the decline in government resources and changing priorities. This affects implementation of policies and legislative reforms.

PNG's economy is heavily dependent on natural resources. The sectors that predominate are agriculture, fisheries, and forestry, which engage most of the labor force (most of which is informal), and the energy and minerals extraction sectors, which account for most of the country's GDP and export earnings. There is significant competition for land and natural resources from consumptive industries such as logging; mining; large scale agroforestry for palm oil; commercial and subsistence fishing; small scale agroforestry for coffee, cacao, tea, betel nut, vanilla, coconuts, fuelwood, and insect farming and trade; creation and sale of cultural art and handicrafts; and cultivation of fisheries, poultry and pigs.

The PNG Biodiversity program will be implemented in Papua New Guinea. The Implementing

Partner is required to follow all host country laws and regulations, and shall use or reference use of existing USAID guidance including: Community Based Natural Resource Management, Forestry, and Fisheries and other applicable international best practice acceptable to USAID on important matters such as battery disposal, and waste management that closely mirror local laws and regulations. All efforts associated with the program are to take place in established dwellings and are not expected to have significant impact on the environment should all conditions be met. National environmental laws and baseline information in the countries covered by the PNG biodiversity program are at various levels, greater detail may be found below.

The table below summarizes the main requirements of Government of Papua New Guinea for environmental management that will apply to the PNG Biodiversity program.

Principal Statute	Outline
Environment Act 2000 and Subsidiary Legislations	Conservation of environment, improvement of environmental standards and control and mitigation of environmental pollution are listed under these laws including the National Constitution , 4th Goal and National Directive Principle.
Mining Act 1992 and Subsidiary Legislations	Responsibilities of mining and quarries and issuance of tennents lies with Mineral Resources Authority(MRA) but in practice to ensure public health for residents by providing primary and public health services, sanitation, water supply, vector and infectious disease control, etc.
Oil and Gas Act(OGA) 1998 and Subsidiary Legislations	Responsibilities in the Oil and Gas Sector and issuance of tennents (petroleum exploration license) lie with MRA . Oil & Gas Regulation 2002 ensures industry, public safety and environment compliance is maintained
Fisheries Act and Subsidiary Legislations	Covers environmental responsibilities in the fisheries sector prior to issuance of fishing licenses.
Forestry Act 1991 and Subsidiary Legislations	Covers environmental responsibilities in the the forestry sector including the issuance of permits

Land Act and Subsidiary Legislation	This act provides the legal framework on use of land in PNG either it be state or customary land. Eighty percent of the land in PNG is customary owned
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- *There are other subsidiary legislations not included in the list above*

The Environment Act (2000) and the Environmental Permits a Regulations 2002 (EPR) provides the overarching legal framework for environment protection and pollution control in Papua New Guinea . This legislation provides the principal mechanism for assessing and mitigating the environmental impacts of projects, both existing and proposed in various sectors. Under the EPR projects are classified as Level 1, Level 2 or Level 3 to determine the level of environmental assessment and requirements involved. According to EPR ,4 schedules show the main Project is Level 3 and the additional works are Level 2.1.

An environmental impact statement (EIS) must be prepared in the prescribed format and submitted to the Director of Environment (DOE) for approval in order to obtain the Environmental Permit. This process is described in sections 51 to 55. An inception report must be submitted for review and submitted as Environmental Impact Statement (EIS) to the DOE. This process takes minimum of 90 days for the approval of the EIS and granting of the EP.

### **Analysis of Potential Environmental Impact**

While development activities are intended to provide benefits for targeted recipients, when managed ineffectively they may cause adverse impacts that can offset or eliminate these intended benefits. Impacts can be direct, indirect, or cumulative. They can also be beneficial or negative. The USAID Sector environmental guidelines are good resources in finding more information on potential impacts for various sectors.

The following link is to all sector guidelines: <http://www.usaidgems.org/sectorGuidelines.htm>  
The following are summaries of potential environmental impacts for respective sector(s) that are related to the scope of this IEE.

### **Support to small / medium enterprises**

Although many Small Medium Enterprises (SMEs) do relatively little direct environmental damage, others can cause significant environmental and related public health difficulties, which vary as broadly as the types of enterprises. SMEs can be more pollution-intensive than larger enterprises (per unit of production). When they are numerous and/or concentrated in particular areas, they can create environmental problems of alarming proportions.

The adverse environmental impacts of SMEs can impose heavy social and economic burdens on their communities—degrading the ecosystem and food sources, undermining the health of neighbors and workers, and consuming fuel and resources beyond the point of renewability. These burdens in turn place significant costs upon not only the culpable SMEs but also other businesses—such as costs of procuring fuel, and costs of lost worker productivity due to sickness

or injury.

Environmental Problems caused by SMEs include:

- Chemical and hazardous waste
- Air pollution and particulate dust
- Water pollution
- Soil erosion
- Natural resource depletion
- Solid waste
- Odor
- Noise
- Health and safety risks

Many decisions made by SMEs have the potential to harm the environment and public health.

Specific examples include:

- Location decisions
- Purchasing decisions
- Processing/manufacturing decisions
- Housekeeping decisions
- Waste disposal decisions

Overall, adverse impacts are often caused by poor practices that go uncorrected because people don't have the right technical information. Insufficient knowledge can lead to improper use of chemicals, inadequate treatment or disposal of solid and liquid waste, uncontrolled chemical air pollution, and production techniques that make intensive use of nonrenewable resources. Health and safety problems, in particular, are compounded by ignorance of industrial safety and environmental standards, as well as by lack of awareness of protective devices that are generally inexpensive and easy to obtain.

### **Capture fisheries**

The following are some potential adverse impacts from mismanaged captured fisheries development projects:

- Over harvesting
- By-catch
- Toxic substances (such as with cyanide fishing)
- Introduced species

### **Ecotourism**

The following are some potential adverse impacts from mismanaged ecotourism projects:

- Soil erosion, from poorly designed or managed roads and trails
- Water quality deterioration
- Deforestation
- Loss of unique flora
- Changes in animal behavior
- Increased pollution
- Undermining the cultural and economic integrity of the local community

- Uncontrolled population growth and in-migration

### **Forestry**

The following are some potential adverse impacts from mismanaged re-forestry and forestry development projects:

- Loss of local biodiversity, including useful niche species
- Introduction of exotic or non-native tree species
- Conversion of natural forest to tree plantations
- Disruption of local communities' current land uses

### **Recommended Threshold Decisions**

#### **- Justification for Categorical Exclusion Request**

With the exception of the specific activities listed in the preceding section, the activities described justify Categorical Exclusions, pursuant to 22 CFR §216.2(c)(1) and (2), for which an Initial Environmental Examination, or an Environmental Assessment are not required because the actions do not have an effect on the natural or physical environment.

Specifically, as currently planned, activities fall into the following classes of action:

- (a) education, technical assistance and training (216.2(c)(2)(i));
- (b) controlled experimentation exclusively for the purpose of research and field evaluation which are confined to small areas and carefully monitored (216.2(c)(2)(ii));
- (c) analyses, studies, and workshops (216.2(c)(2)(iii)) and also evaluation exercises;
- (d) document and information transfer (216.2(c)(2)(v)); and
- (e) activities that will develop the capability of recipient countries to engage in development planning (216.2(c)(2)(xiv)).

#### **- Negative Determination with Conditions**

Activities with potential impacts to the environment under the following sectors are recommended for a Negative Determination with Conditions threshold determination. When implemented ineffectively these activities may cause adverse impacts that can offset or eliminate the intended benefits. Mitigating environmental impacts with these activities requires a participatory approach to activity/program design and management. Strong technical design of the projects is also critical. The following are specific conditions to mitigate the potential negative impacts for respective sectors.

#### **Support to small / medium enterprises**

The following are conditions and best practices that should be implemented for activities involving SMEs:

- Activities shall be conducted following principles of USAID small scale guidelines chapters
- In applying environmental oversight to SME activities, USAID will support business service (BDS) and credit providers in developing screening of their activities to categorize the

SME's work to the types and seriousness of environmental impacts they generate. A BDS or credit provider needs to ensure that assistance for SME complies with local, national, USAID, or its own organizational environmental policies. Yet, it is unreasonable to expect BDS and credit providers to conduct a detailed assessment of the impacts of every SME they work with. The goal of the screening phase is to determine quickly and easily assess if an assistance request from an SME (for a loan, business planning, accounting training, etc.) will need environmental review before it can be approved. The chapter on "Institutionalizing Environmental Capacity" provides more guidance in this area.

- The table on page 10 of the Introduction MSEs and the Environment chapter outlines how the consideration of environmental issues aligns with mitigation measures and the steps each actor can take to contribute to environmental compliance. This includes BDS providers, SME Direct Lenders; Intermediate Credit Institutions (ICIs) and USAID. This chapter can be found at the following link:

[http://usaidgems.org/Documents/SectorGuidelines/ENCAP/mse\\_introduction.pdf](http://usaidgems.org/Documents/SectorGuidelines/ENCAP/mse_introduction.pdf)

- With activities involving hazardous materials, the implementing partner should work with the business to develop a written plan to ensure appropriate procurement, storage, management and/or disposal of these materials.

### Agriculture

The following are conditions and best practices that should be implemented:

- All agriculture development activities shall be conducted following principles for environmentally sound agriculture development, as provided in the USAID Sector Environmental Guidelines – Agriculture. This document can be found at:  
<http://www.usaidgems.org/Sectors/agriculture.htm>
- Design of activities should address soil erosion and soil and water conservation (guidance on this can be found starting on page 14 of the environmental guidelines).
- Activity design and implementation should factor climate change (guidance on this can be found starting on page 22).
- An Environmental Monitoring and Mitigation Plan (EMMP) shall include the principles of the agriculture guidelines.

### Capture fisheries

The following are conditions and best practices that should be implemented:

- All fisheries development activities shall be conducted following principles for environmentally sound development, as provided in the USAID Sector Environmental Guidelines – Fisheries and aquaculture. This document can be found at the following site:  
<http://usaidgems.org/Sectors/fisheries.htm>
- Promote best practices for capture fisheries (see page 15 of the guidelines).
- An Environmental Monitoring and Mitigation Plan (EMMP) shall include the principles of the Fisheries and Aquaculture guidelines.
- Common mitigation measures for different types of fisheries activities can be found on page 24 of the guidelines,

### Ecotourism

The following are conditions and best practices that should be implemented with ecotourism activities:

- Activities shall be conducted following principles for environmentally sound development, as provided in the USAID Chapter in the Sector Environmental Guidelines – Ecotourism. This document can be found at the following site: <http://usaidgems.org/Sectors/ecotourism.htm>
- An Environmental Monitoring and Mitigation Plan (EMMP) shall include the principles of the guidelines.
- Common mitigation measures for different components of an ecotourism activity can be found on page 7 of the guidelines,

#### Conditions for forestry: reforestation, natural forest management, and agroforestry

The following are conditions and best practices that should be implemented:

- All forestry development activities shall be conducted following principles for environmentally sound development, as provided in the USAID Sector Environmental Guidelines – Forestry. This document can be found at the following site: <http://usaidgems.org/Sectors/forestry.htm>
- Implementation of forestry activities should strive to reduce greenhouse gas emissions and maximize sequestration.
- An Environmental Monitoring and Mitigation Plan (EMMP) shall include the principles of the Forestry guidelines.
- Common mitigation measures for different types of forestry activities (ex. Sustainable Forestry Management; Agroforestry; Reforestation and plantation Forestry) can be found on page 31 of the guidelines,

#### Conditions for species management, research, recovery, and reintroduction

The following are conditions and best practices that should be implemented:

- Where handling of wildlife is inevitable, implementer(s) will follow established CITES and/or IUCN guidelines for safe and humane handling, care, rehabilitation and/or release of wildlife back to suitable habitat, including human health safeguards from venom, injury or disease. Where procedures or capacity are not in place, USAID will support technical assistance and training. Resources include: CITES Guidelines for the Disposal of confiscated live specimens of species included in the Appendices [Resolution Conf. 10.7, adopted at the 10th meeting of the Conference of the Parties (Harare 1997)]; IUCN guidelines for the placement of confiscated animals [approved at the 51st Meeting of the IUCN Council (Gland, 2000)] (<https://portals.iucn.org/library/efiles/documents/2002-004.pdf>); and experts at accredited zoological institutions and wildlife sanctuaries.
- For species reintroduction programs, the Grantee must identify the factors that will diminish the ability of the species to survive in the wild and mitigate these factors to ensure successful reintroduction. A good resource for guidance in species reintroduction are the following:
  - o Kleiman, D. G. (1989). Reintroduction of captive mammals for conservation. *BioScience*, 39, 152-161.
  - o Kleiman, D. G., Stanley Price, M. R., & Beck, B. B. (1994). Criteria for reintroductions. In P. J. S. Olney, G. M. Mace, & A. T. C. Feistner (Eds.), *Creative Conservation* (pp. 287-303), London, Chapman & Hall.

### **Climate Risk Management**



As per the ADS 201mal and the executive order on “Climate-Resilient International Development,” USAID should factor climate resilience into international development programs and investments. Therefore, the design team and/or implementing partner will identify expected climate change impacts over the life of the activity’s expected benefits and (if appropriate) demonstrate how those risks will be reduced in order to ensure sustainability of the activity’s objectives.

The climate factors impacting PNG include: a rise in annual average temperatures by 2030 between 0.4 and 1.0 °C, with more hot days and warm nights; an increase in average annual and seasonal rainfall in the course of the century; inconsistent drought projections; may be a decrease in the number of tropical cyclones, but likely higher maximum wind speeds of cyclones with a higher intensity of rainfall around them. Sea level rise will continue; by 2030 this will be between 4 and 15 cm and around the turn of the century 20-60 cm, leading to higher impacts of storms.

Due to its physical and geographical characteristics, many parts of PNG are highly vulnerable to climate change and sea level rise. The majority of socio-economic activities and infrastructure development is in coastal areas or vulnerable areas along rivers or in highlands. The potential impacts can be summarized as follows:

- Increased coastal flooding, mainly on the north shores
- Increased inland flooding in valleys and wetlands, both in lowlands and highlands
- Erratic precipitation with increased risks of landslides
- Malaria could become endemic in higher mountain areas which are up till now malaria free
- Important climate-sensitive crops (sweet potato, coffee, cocoa) will suffer from changes in climate (temperature and rainfall)
- Increase in sea surface temperature and acidity can severely damage the coral reefs (bleaching).

Using the USAID Climate Risk Screening and Management Tool for the Program, the A/COR, in collaboration with the MEO/CIL, came up with a CRM Summary Table (see below) on assessed risks and how potential climate change impacts will be addressed in the PNB Biodiversity Program.

1.1 Define Program Intervention	Goal 1: National and provincial-level governance strengthened to better manage protected areas. IR1: Build national and provincial government staff capacity to support improved customary management of lands for biodiversity conservation IR 1.2: Establish systems for transparent and accountable decision-making around natural resource ownership, allocation and management, including accessible systems for redress.
1.2 Time-frame	0-20 years
1.3 Geography	TBD areas of exceptional terrestrial and marine biodiversity

2. Climate Risks	<p>Since the interventions under this component focus on the development of plans, training courses, and training materials, the risks to the activity are minimal, but the following climate risks will be included in the developed materials:</p> <ul style="list-style-type: none"> <li>• Tropical storms;</li> <li>• Droughts;</li> <li>• Extreme rainfall;</li> <li>• Sea level rise</li> </ul>
3. Adaptive Capacity	The adaptive capacity of national government agencies and LGUs is low to medium
4. Climate Risk Rating	Low
5. Opportunities	<ul style="list-style-type: none"> <li>• Support National Gov initiatives to support protected area planning to reduce CO2 emissions</li> <li>• Interventions under this component will improve the use, access to and understanding of climate data, especially related to land use planning; natural resource ownership, allocation and management, and systems for redress.</li> <li>• Improve planning and government capacity to include consideration of climate risks.</li> <li>• Capitalize on co-benefits related to biodiversity conservations</li> </ul>
1.1 Define Program Intervention	<p>Goal 2: Community-based Natural Resource Management (NRM) institutions strengthened at the clan level to reduce key biodiversity threats</p> <p>IR 2.1: Equip communities and local CSOs with knowledge and abilities on managing natural resources more sustainably</p>
1.2 Time-frame	0-20 years
1.3 Geography	TBD areas of exceptional terrestrial and marine biodiversity
2. Climate Risks	<p>Climate change affects the distribution and abundance of vulnerable species, with changes in temperature, precipitation, seasonal patterns, and ocean conditions shifting suitable habitats. Changes in climate play an important role in ecosystem transitions and potential shifts as tipping points are reached. Aside from the ecological impacts of climate change on biodiversity, human communities without sustainable climate change adaptation options can put pressure on ecosystems, resulting in further degradation.</p> <p>Typhoons and storm surge events will result in a loss of habitat and affect both human settlements and the natural environment. Increased</p>

	<p>storm surges will result in a loss of ocean and near inland biodiversity. Rising sea levels, both on average and during extreme events have steadily degraded coastal areas for decades and are projected to increase. Mean sea levels are expected to rise between 17 and 38 cm by 2060. Once sea levels rise 20 cm above current levels, a coastal flooding event that historically occurred once every 100 years would occur, on average, every 10 years. Increased sea and air temperatures will also reduce interest in ecotourism.</p>
3. Adaptive Capacity	The adaptive capacity of individuals, customary landowners and community members is low.
4. Climate Risk Rating	Medium
5. Opportunities	<p>The activity has the opportunity to integrate climate risk and sustainable biodiversity conservation. Data collection on terrestrial and marine wildlife management will also be used to track climate change impacts. Reforestation work will reduce GHG emissions.</p>
6.1 Climate Risk Management Options	<p>Protect critical marine and biodiversity habitats</p> <p>Strengthen natural resource management to include consideration of climate risks</p> <p>Work with customary landowners and local government better understand and manage and plan for climate risks</p>
6.2 How Climate Risks are Addressed	<p>Increased/improved understanding and awareness of the environmental, social and economic impacts associated with climate change risks to natural resource management and best practices for mitigation and adaptation approaches.</p> <p>Develop and disseminate case studies on climate-resilient management.</p> <p>Develop climate change adaptation strategies and support climate change planning for customary landowners and communities.</p> <p>The activity will reduce emissions from deforestation and degradation.</p>

7. Next Steps for Program Design	<p>The activity will develop or refine climate risk-assessment tools, sector reference materials, and climate risk profiles that bridge the gap between national requirements, available data, and local plans as it relates to biodiversity conservation.</p> <p>The activity will conduct climate vulnerability assessments, forest assessments and identify the gaps in available climate data needed to assess impacts in natural resource management.</p>
1.1 Define Program Intervention	<p>Goal 3: Alliances formed to support conservation activities with co-benefits</p> <p>IR 3.1: Identify and develop partnerships with the private sector and non-traditional partners who can support conservation activities.</p>
1.2 Time-frame	0-20 years
1.3 Geography	TBD areas of exceptional terrestrial and marine biodiversity
2. Climate Risks	Medium
3. Adaptive Capacity	The adaptive capacity of the private sector and non-traditional partners is medium
4. Climate Risk Rating	Medium
5. Opportunities	The activity has the opportunity to develop “co-benefits” that include climate
6.1 Climate Risk Management Options	Climate change is a dramatic threat that not only creates its own direct impacts (e.g., increased ocean acidity, stress from temperature fluctuations, increased drought, and glacier melting) but also exacerbates impacts from other threats, particularly from invasive species, fire, and fragmentation. Therefore, it will be essential that plans, tools and actions minimize climate risks. The program will also examine opportunities to invest in land-use practices that slow, reverse, or stop GHG emissions.
6.2 How Climate Risks are Addressed	<p>Increased/improved understanding and awareness of the environmental, social and economic impacts associated with climate change risks to natural resource management and best practices for mitigation and adaptation approaches.</p> <p>Develop and disseminate case studies on climate-resilient management.</p> <p>Develop climate change adaptation strategies and support climate change</p>

	<p>planning for customary landowners and communities.</p> <p>The activity will reduce emissions from deforestation and degradation.</p>
7. Next Steps for Program Design	<p>The activity will develop or refine climate risk-assessment tools, sector reference materials, and climate risk profiles that bridge the gap between national requirements, available data, and local plans as it relates to biodiversity conservation.</p> <p>The activity will conduct climate vulnerability assessments, forest assessments and identify the gaps in available climate data needed to assess impacts in natural resource management.</p>

### **Monitoring and Implementation**

In addition to the specific conditions enumerated in the Negative with Conditions section, the threshold determinations recommended are contingent on full implementation of the following general monitoring and implementation requirements:

#### **USAID Requirements**

- 1. Environmental compliance actions and results in USAID solicitations and awards.** The Contract/Agreement Officer will include language and reference to this IEE in appropriate solicitations and awards. Suggested language for use in solicitation and awards can be found at the following link: <http://www.usaid.gov/ads/policy/200/204sac>
- 2. Implementing Partner (IP) Briefings on Environmental Compliance Responsibilities.** The Contract/Agreement Officer's Representative (C/AOR) will provide the IP with a copy of this IEE; the IP will be briefed on their environmental compliance responsibilities by their C/AOR. During this briefing, the IEE conditions applicable to the IP's activities will be identified.
- 3. Compliance Monitoring.** As required by ADS 204.3.4, USAID will actively monitor and evaluate, by means of desktop reviews and site visits, whether there are new or unforeseen consequences arising during implementation that were not identified and reviewed in accordance with 22 CFR 216 (Reg. 216). USAID will also monitor the need for additional review. If additional activities not described in this document are added to this program, an amended environmental examination will be prepared in a timely manner and approved.
- 4. Compliance Reporting.** A summary report of Mission's compliance relative to this IEE will be sent to the BEO on an annual basis, normally in connection with preparation of the Mission's annual environmental compliance report required under ADS 203.3.8.5 and 204.3.3. The BEO or his/her designated representative may conduct site visits or request additional information for compliance monitoring purposes.

#### **Implementing Partner (IP) Requirements**

1. **Development of Environmental Mitigation and Monitoring Plan (EMMP).** For activities that are subject to one or more conditions set out in the “Recommended Threshold Decision” section of this IEE, the IP will develop and provide an EMMP for USAID C/AOR review and approval, documenting how their project will implement and verify all IEE conditions that apply to their activities. The EMMP will also identify how the IP will assure that IEE conditions that apply to activities supported under subcontracts and sub-grants are implemented. (In the case of large sub-grants or subcontracts, the IP may elect to require the sub-grantee/subcontractor to develop their own EMMP.)
2. **Integration and implementation of EMMP.** The IP will integrate the EMMP into their project work plan and budgets, implement the EMMP, and report on its implementation as an element of regular project performance reporting. The IP will ensure that sub-contractors and sub-grantees integrate implementation of IEE conditions, where applicable, into their own project work plans and budgets and report on their implementation as an element of sub-contract or grant performance reporting.
3. **Integration of environmental compliance responsibilities in sub-contracts and grant agreements.** The IP will ensure that sub-contracts and sub-grant agreements reference and require compliance with relevant elements of the IEE and any attendant conditions.
4. **Assurance of sub-grantee and sub-contractor capacity and compliance.** The IP will ensure that sub-grantees and subcontractors have the capability to implement the relevant requirements of this IEE. The IP will, as and if appropriate, provide training to sub-grantees and subcontractors in their environmental compliance responsibilities and in environmentally sound design and management (ESDM) of their activities.
5. **Compliance to ADS 201mal.** The implementing partner is required to comply with ADS 201: A Mandatory Reference for ADS Chapter 201 entitled “Climate Resilient Management for USAID Projects and Activities” requiring agencies engaged in international development to assess and evaluate climate-related risks and vulnerabilities and to adjust strategies, planning, programs, projects, investments, and overseas facilities, as appropriate, based on the assessments and evaluations.
6. **New or modified activities.** As part of its initial Work Plan, and all Annual Work Plans thereafter, the IP, in collaboration with their C/AOR, shall review all planned and ongoing activities to determine if they are within the scope of this IEE. If any IP activities are planned that would be outside the scope of this IEE, an amendment to this IEE addressing these activities will be prepared for USAID review and approval. No such new activities will be undertaken prior to formal approval of this amendment. Any ongoing activities found to be outside the scope of the approved Reg. 216 environmental documentation will be halted until an amendment to the documentation is submitted and written approval is received from USAID. This includes activities that were previously within the scope of the IEE, but were substantively modified in such a way that they move outside of the scope.
7. **Compliance with Host Country Requirements.** Nothing in this IEE substitutes for or supersedes IP, sub-grantee and subcontractor responsibility for compliance with all applicable host country laws and regulations for all host countries in which activities will be conducted under the USAID activity. The IP, sub-grantees and subcontractor must comply with each host country’s environmental regulations unless otherwise directed in writing by USAID. However, in case of conflict between host country and USAID regulations, the latter shall govern.
8. **Compliance Reporting.** IPs will report on environmental compliance requirements as part

of their routine project reporting to USAID.

### **Revisions and Limitations**

If during implementation, project activities are considered outside of those described in this document, an amendment shall be submitted. Pursuant to 22CFR216.3(a)(9), if new activities are added and/or information becomes available which indicates that activities to be funded by the project might be “major” and the project’s effect “significant,” this determination will be reviewed and revised by the C/AOR of the project, and submitted to the Mission Environmental Officer and Bureau Environmental Officer for approval and, if appropriate, an environmental assessment will be prepared. It is the responsibility of the C/AOR to keep the Mission Environmental Officer and the BEO informed of any new information or changes in the activity that might require revision of the IEE.

## APPROVAL OF INITIAL ENVIRONMENTAL EXAMINATION

Office Director,  
Clearance

CLEARED  
Paul Seong (Acting)

Oct. 31, 2018  
Date

Mission Environmental Officer  
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CLEARED  
Marian Cruz Navata

Oct. 31, 2018  
Date

Regional Environmental Advisor  
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CLEARED  
Mark Childerhose

Nov. 14, 2018  
Date

Deputy Mission Director (Acting)

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11/23/18  
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Patrick Wesner

11/27/18  
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William Gibson

12/21/2018  
Date